

SEWANEE

THE UNIVERSITY OF THE SOUTH

DEPARTMENT OF EARTH AND ENVIRONMENTAL SYSTEMS

December 12, 2017

The Honorable Roy Cooper
20301 Mail Service Center
Raleigh, NC 27699-0301
20 November 2017

Governor Cooper,

In commendation of your decision on September 14th, 2017 to delay the issuing the 401 water quality permit and buffer authorization for the projected Atlantic Coast Pipeline and other actions taken by your administration to postpone the project, I write to you as a concerned environmental constituent. With North Carolina's energy sector at the forefront of current political debates, full consideration of the possible negative environmental effects of the project and the actual necessity of another natural gas pipeline in North Carolina is imperative.

You and the NCDEQ have made creditable efforts towards disapproving or requesting additional information on required permits for sediment and erosion control, water quality, and air quality despite the federal government's approval of the project.

In regards to issuing sediment and erosion control and water quality permits, I strongly encourage you to look closely at information provided by FrackFreeNC, composed of 19 organizations opposing "unneeded" natural gas production and infrastructure in North Carolina, and The North Carolina Wildlife Resources Commission (NCWRC).

One of the primary impacts on water quality noted by FrackFreeNC is that "The Atlantic Coast Pipeline project will cross nearly 7 miles of streams and destroy nearly 28 acres of forests and riverside (riparian) vegetation, which serve as buffers to prevent polluted runoff into those streams." The infiltration of "polluted runoff" into the crossed streams causes two considerable problems. Firstly, FrackFreeNC indicates that the ACP will cross headwaters to the Pamlico-Albemarle Estuary, home to North Carolina fisheries and fisheries in the Atlantic ocean. Therefore, increased sedimentation and pollution of these headwaters could disturb the livelihood of these fisheries and economic revenue they bring to the state.

Secondly, many of the North Carolina rivers projected to be crossed by the ACP are home to species of concern, threatened or endangered. The NCWRC's "Comments on the Draft Environmental Impact Statement for the Atlantic Coast Pipeline and Supply Header Project" reported that not only could sediment and polluted runoff negatively affect "sensitive species" downstream, there is also potential impact on species who rely on the vegetated buffer zones that would be destroyed in the construction process of the ACP.

FrackFreeNC indicates that the "federally endangered" Tar River spiny mussel, one of two endangered mussel species that could be affected by the ACP, is only found in four streams in North Carolina. Three of the four streams would be crossed by the ACP. This is just one example of a "sensitive species" that is likely to be affected by the ACP. Therefore, maintain our vast ecological biodiversity, I

strongly urge you and your administration to inquire more information about the potential effects on North Carolinian "sensitive species" in our streams and rivers.

Another devastating ecological event that could occur if the project is approved is the reduction in populations of the many migrating birds and birds that use the vegetated buffer zone as habitat. The NCWRC states, in its "Comments," that habitat fragmentation, by the destruction of the vegetated buffer zones, would create the "edge effect." The edge effect causes native species to be forced out of their natural habitats and increased influx of non-native species causing new predation ultimately resulting in less productive populations of endemic species. Many endemic species are already threatened by a multitude of other factors thus the construction of the ACP could potentially cause further degradation of populations.

The bottom line is that the full extent of impacts on water quality and "sensitive species" populations are still unknown, but waterbodies and certain species will be affected by habitat fragmentation, loss of vegetation, and increased erosion of sediments into streams, all of which will be products of the construction of the ACP. Therefore it is critical that full analysis of probable impacts on water quality and species be evaluated. After analysis, when coming to any decisions, it is important to strongly consider the amount of short and long term disturbances the approval of the ACP could cause.

In regards to air quality, the main point of concern is air pollution emitted by air compressor stations that will be built throughout the track of the ACP. The ACP project includes a compressor station in Northampton County, NC.

The Southwest Pennsylvania Environmental Health Project composed a "Summary on Compressor Stations and Health Effects." The summary revealed that although compressor stations pass NAAQS, National Ambient Air Quality Standards, areas directly adjacent to compressor stations, within 1 to 2 miles, are in harm's way.

The Southwest Pennsylvania Environmental Health Project indicates that compressor stations pass NAAQS because the standards are based on yearly averages; however, large and acute emitory events, blowdowns, can be planned and occur often at these stations. Methane, known to be 30 times more potent than the renowned greenhouse gas CO₂, and VOC formaldehyde, considered a Hazardous Air Pollutant by the EPA, would be emitted by the compressor station in Northampton County and have adverse effects on the environment people who live in close proximity to the compressor.

Here lies another risk that would accompany the approval of the ACP. Along with potential degradation of water quality and native species, Air quality could also be in danger. The many probable hazards this project could bring to our state, in my opinion are enough to deny its approval. However, one other aspect of the ACP project being debated is the necessity for this pipeline based on demand and economic gain.

Synapse Energy Economics Inc. conducted a study for the Southern Environmental Law Center, SELC, on the necessity of the ACP. The study looked at natural gas demand under the lowest possible gas use and highest possible gas use and both results of natural gas demand fell under the projected amount of natural gas supply. Thus even at highest use and demand for natural gas, there would still be a large amount of excess natural gas supply if the ACP was activated.

The lack of market support, reported by Synapse Energy Economics and the SELC, combined with devastating economic impacts due to loss of property values and ecosystem services, recorded by Key-Log Economics in the "Economic Costs of the Atlantic Coast Pipeline," indicate that the ACP project is not necessary nor economically practical for the long term future.

In conclusion, I strongly urge you and your administrators to continue delaying the approval processes for the ACP to gather more information on the negative environmental effects the projects could impose. I also encourage you to consider if the economic benefits and actual need for the pipeline outweigh the potential degradation of our ecologically diverse and flourishing state.

Sincerely,



Constance Ambler

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